HERITAGE REMEDIATION/ENGINEERING, INC.

5656 Opportunity Drive
Toledo, OH 43612
Phone: 419/478-4396
FAX: 419/478-4560

March 16, 1992

Mr. Gary Sanderson
Case Manager
Bureau of ECRA
NEW JERSEY DEPARTMENT of ENVIRONMENTAL PROTECTION
401 E. State St.
5th Floor
Trenton, N.J. 08625

Re: February 1992 Monthly Project Status Report
Former HEXCEL CORP. Site
205 Main Street, Lodi Borough
Bergen County NJ
ECRA Case No. 86009
HR/E Project No. 60027

Dear Mr. Sanderson:

On behalf of HEXCEL CORPORATION, Heritage Remediation/Engineering, Inc. (HR/E) has prepared this monthly status report of remedial activities performed at the above reference site. This report is in partial fulfillment of paragraph 36 of the August 7, 1991 conditional approval letter requiring the submittal of a monthly status report and describes activities performed over the period from February 1, 1992 to March 1, 1992. During February, HR/E personnel conducted site activities, which included treatment of accumulated basement seepage water.

An operator has been identified for the ground-water recovery and treatment system. During February, HR/E staff conducted a training program for this individual. Don Hayden (HR/E Recovery Technician) gave instructions on the chemical treatment procedure. Margaret Shay (HR/E Project Engineer) gave instructions on air stripper, incinerator and monitoring equipment operation. Dan Wherley, (HR/E Senior Hydrogeologist) gave instruction on water level monitoring, ground-water recovery system operation and NAPL systems operation.

92HW1019.T1

STATUS ON IMPLEMENTATION OF THE CLEAN-UP PLAN

A. SOILS

Pilot Soil Vapor Extraction

A proposal for a pilot soil vapor extraction project for remediation of organic vapors in the vadose zone is being prepared and will be submitted as part of an upcoming monthly status report.

B. GROUND WATER

Collection, Treatment, and Discharge of Basement Seepage Water

The air stripping towers and incinerator were operated in February 1992, treating and discharging approximately 4,000 gallons of water.

Upper Overburden Aquifer

Static water levels were collected in February 1992 and will be presented at a later date.

Lower Overburden Aquifer

Static water levels were collected in February, 1992 and will be presented at a later date.

Bedrock Aquifer

Discharge measurements of the production well were taken in order to determine the water usage by the cooling system. This data was graphed and is presented in Appendix A.

C. GROUND WATER TREATMENT SYSTEM OPERATION

During this period, 4,000 gallons of basement seepage water was discharged to the PVSC (Appendix B).

D. DNAPL RECOVERY SYSTEM OPERATION

The DNAPL recovery system was not operated during February, 1992.

E. LNAPL RECOVERY SYSTEM OPERATION

The LNAPL recovery system was not operated during February, 1992.

F. STATUS OF PERMITS

Air Control Apparatus

The current operating permit expires on June 30, 1992.

SIU Permit

On December 17, 1991 the NJDEPE Bureau of Industrial Discharge permits issued draft permit NJ0081507. Public notice of the draft permit was published on February 3, 1992 and was closed March 4, 1992. We know of one request to extend the public comment period and to hold a non-adversarial public hearing. Comments by Hexcel are attached as Appendix C. Therefore, the expected date of final permit issuance is unknown.

PVSC Discharge Permit

No activity occurred during this time period.

NJPDES Discharge to Ground Water Permit

No activity occurred during this time period.

NJPDES Discharge to Surface Water Permit

No activity occurred during this time period.

G. ALTERNATE DISCHARGE SOURCE

During this time period, HR/E completed preparation of a Preliminary Feasibility Study report. The report was submitted to the A. William Nosil for review.

H. SCHEDULE UPDATE

The attached schedule (Table 1) summarizes the projected timetable for the current period. It has been adjusted for the requirements submitted by the NJDEPE in the letter dated March 5, 1992 (Appendix D).

Should you have any questions or concerns regarding this report, please do not hesitate to call.

Sincerely,
Heritage Remediation/Engineering, Inc.

Robert R. Beckwith, CPG
Senior Hydrogeologist

RRB:djs

Attachments

cc: A. William Nosil
Lisa Bromberg
Renee van de Griend
James Higdon
Essam Eldin E. Saleh
Joe Ritchey

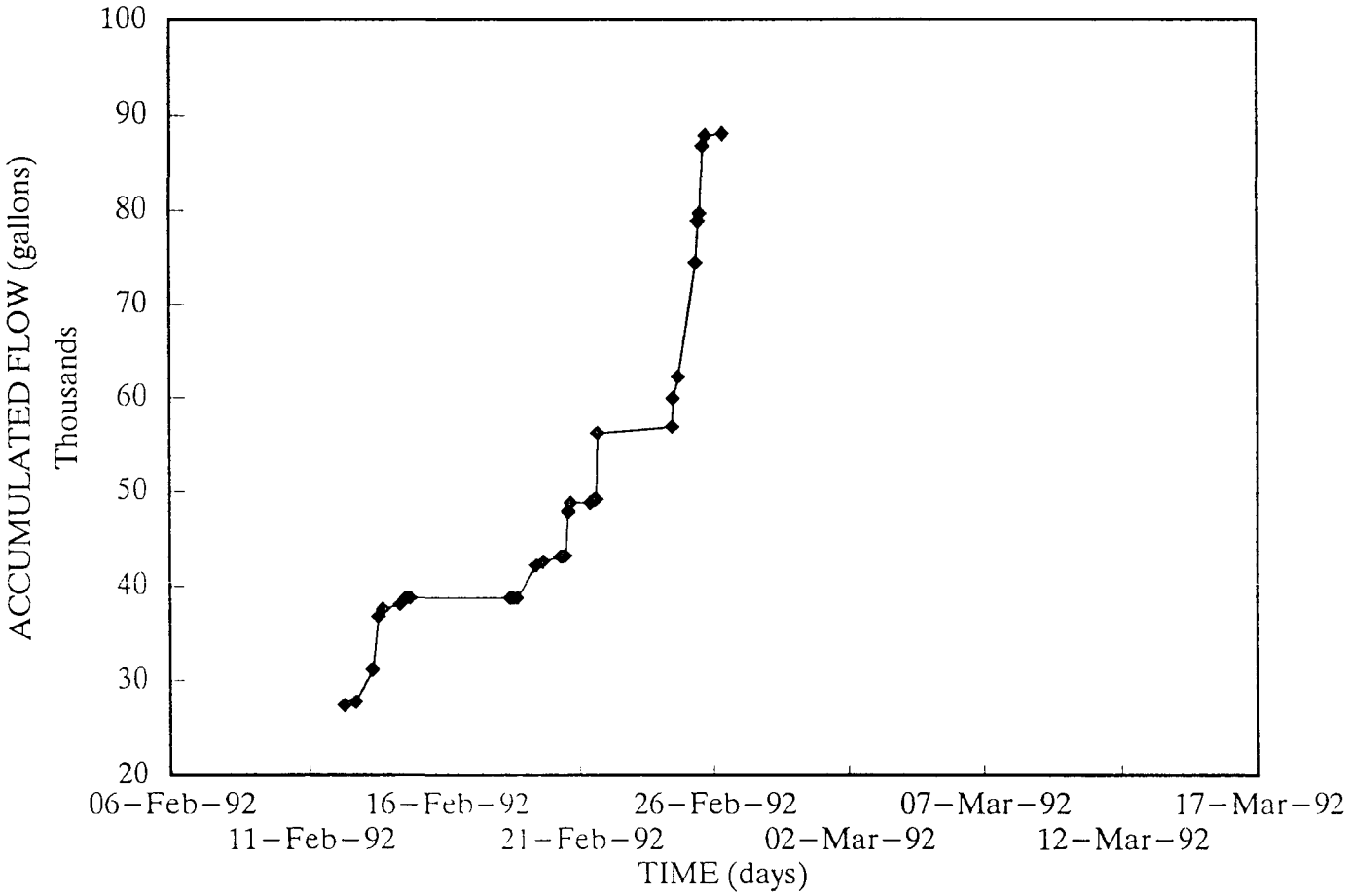
92HW1019.T1

APPENDIX A

Production Well
Discharge Graphs

PRODUCTION WELL ACCUMULATED FLOW

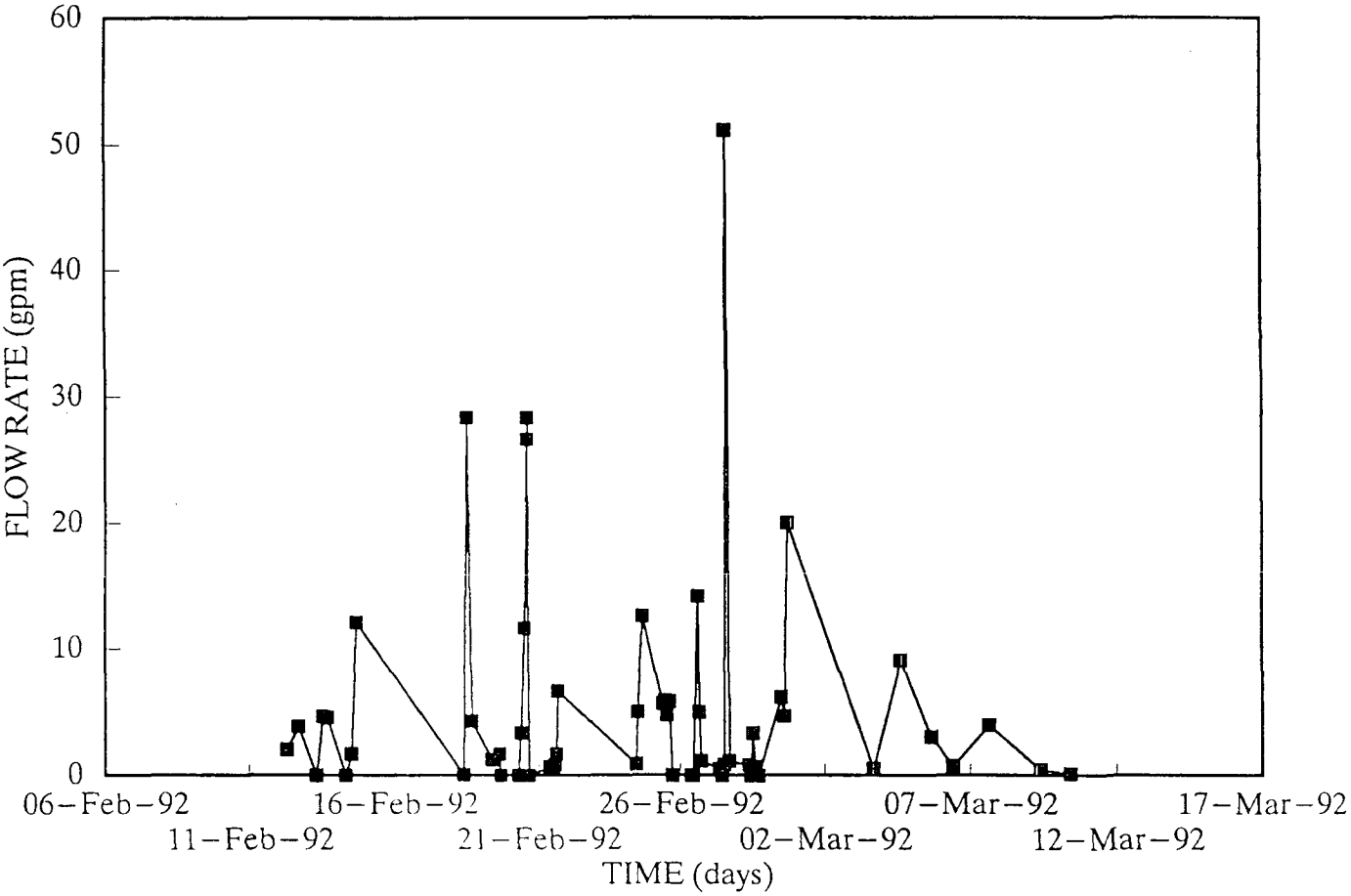
FINE ORGANICS CORP. SITE



884170006

PRODUCTION WELL PUMPING RATE

FINE ORGANICS CORP. SITE



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APPENDIX B

Hexcel Contribution to Fine Organics Corporation Industrial User Discharge Report

HERITAGE REMEDIATION/ENGINEERING, INC.

5656 Opportunity Drive
Toledo, OH 43612
Phone: 419/478-4396
FAX: 419/478-4560

March 13, 1992

Mr. Jim Higdon
FINE ORGANICS CORPORATION
205 Main St.
P.O. Box 687
Lodi, NJ 07644

Re: 1992 February Hexcel contribution to Fine Organics Corporation Industrial User Discharge Report MR-2 form.
HR/E Project No. 60027/8.3

Dear Jim:

Attached is the MR-2 form presenting analytical data for the batch discharge of treated basement seepage water. Since we have not begun continuous treatment and discharge, we have not begun collecting all of the information requested as part of the current permit.

If you have any questions, do not hesitate to contact us.

Sincerely yours,
Heritage Remediation/Engineering, Inc.

Joseph D. Ritchey, P.E.
Engineering Manager

JDR:djs

Attachments

cc: A. William Nosil

92JR1025.T1

884170009

USER CHARGE SELF MONITORING REPORT

NAME: Fine Organics Corporation

ADDRESS: 205 Main Street, Lodi, NJ 07644

FACILITY LOCATION:

OUTLET DESIGNATION (17 DIGITS): 17405041-37430-0171 Outlet # Industrial Sewer

MONITORING PERIOD					
02	01	92	02	29	92
MO	DAY	YEAR	MO	DAY	YEAR
START			END		

Vol Discharged This Period
4,000 GALS
CU.FT X 7.48 = Gallons
Effluent Meter Reading Last Day This Period

DATE	BOD 0310 (mg/ℓ)	TSS 0530 (mg/ℓ)	pH	COD	µg/ℓ PCB	Station Location	Lab Sample #	Gal.
01/27	1,525.5	100	9.067	5000	2.96	Tank	2839	4,000
01/27	---	---	---	---	--	AST Effluent	2839	---
02/05	---	---	---	---	ND	Final Tank	2854	---
					ND indicates less than 0.5 µg/ℓ			

SIGNATURE OF PRINCIPAL OR AUTHORIZED AGENT	TYPE NAME AND TITLE	TELEPHONE NO.
Joseph D. Ritchey	Joseph D. Ritchey	800-338-4396
	Engineering Manager	
		DATE 3/13/90

PVSC FORM MR-2 REV. 2
1/86

92JR1025.T1

884170010

ALL-TEST ENVIRONMENTAL LABORATORIES, INC.
60 Railroad Avenue, Hasbrouck Heights, N.J. 07604
(201) 288-6511 FAX: (201) 288-6887

Client Name: Heritage Rem./Eng. Date: January 30, 1992
Laboratory Project #: S-2839
Project Id: 61012
Reference: Hexcel

LABORATORY AUTHENTICATION STATEMENT

I certify that ALL-TEST ENVIRONMENTAL LABORATORIES meets the Laboratory Performance Standards and Quality Control requirements specified in N.J.A.C. 7:18, 40 CFR Part 136 for Water and Wastewater analyses and SW 846 for Solid Waste Analyses. I have personally examined and am familiar with the information contained in this report, and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate, complete, and meets the standards specified in N.J.A.C. 7:18, 40 CFR Part 136, and/or SW 846.

By: I. Berkowitz

Irving Berkowitz
Laboratory Manager

CERTIFIED BY NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION, LAB. #02525

884170011

ALL-TEST ENVIRONMENTAL LABORATORIES, INC.
60 Railroad Avenue, Hasbrouck Heights, N.J. 07604
(201) 288-6511 FAX: (201) 288-6887

Method 608 (PCB's)

Project No. 61012
Lab No. S-2839
Client Name: Heritage Remediation

Matrix: Water
Date Received: 1/27/92
Date Analyzed 1/27/92

Sample Location	Final Tank effluent	MDL ug/l
PCB-1016	ND	0.5
PCB-1221	ND	0.5
PCB 1232	ND	0.5
PCB-1242	2.96 ug/l (ppb)	0.5
PCB-1248	ND	0.5
PCB-1254	ND	0.5
PCB-1260	ND	0.5

By:
Irving Berkowitz
Lab Manager

MDL = Method Detection Limit
ND = Non Detected

CERTIFIED BY NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION, LAB. #02525

884170012

ALL-TEST ENVIRONMENTAL LABORATORIES, INC.

60 Railroad Avenue, Hasbrouck Heights, N.J. 07604
(201) 288-6511 FAX: (201) 288-6887

February 3, 1992

Mr. Joe Ritchey
Heritage Remediation/Engineering, Inc.
Toledo Division
5656 Opportunity Drive
Toledo, Ohio 43612

Re: Project No. 61012

Lab Project No. S-2839

Please note the following results for the One (1) Aqueous sample received on 1/27/92 .All results are reported in mg/l (ppm) except for Ph.

Analysis ID	H-2 Final Tank
BOD	1525.5 mg/l (ppm)
COD	5000.0 mg/l (ppm)
T.S.S.	100.0 mg/l (ppm)
Ph	9.067

By:

Irving Berkowitz
Laboratory Manager

ALL-TEST ENVIRONMENTAL LABORATORIES, INC.
60 Railroad Avenue, Hasbrouck Heights, N.J. 07604
(201) 288-6511 FAX: (201) 288-6887

Volatile Organic Analysis Data

Project No. 61012 Hexel
Sample No. S-2839 AST INF
Client Name: Heritage Remediation

Matrix: Water
Dilution Factor: 100:1
Date Analyzed: 1/29/92

COMPOUND	UG/L	MDL
Chloromethane	ND	1000
Vinyl Chloride	826J	1000
Bromomethane	ND	1000
Chloroethane	ND	1000
Trichlorofluromethane	ND	500
1,1-Dichloroethene	298J	500
Methylene Chloride	28433.2	500
Trans-1,2 Dichloroethene	ND	500
1,1 Dichloroethane	510.6	500
Chloroform	372J	500
1,1,1-Trichloroethane	6904.0	500
Carbon Tetrachloride	816.7	500
Benzene	492J	500
1,2-Dichloroethane	1180.1	500
Trichloroethene	7298.9	500
1,2-Dichloroprapane	ND	500
Bromodichloromethane	ND	500
Trans-1,3-Dichloropropene	ND	500
Toluene	7631.5	500
Cis-1,3-Dichloropropene	ND	500
1,1,2-Trichloroethane	1447.1	500
2-Chloroethyl Vinyl Ether	ND	500
Tetrachloroethene	36474.5	500
Dibromochloromethane	ND	500
Chlorobenzene	24392.9	500
Ethylbenzene	269J	500
m&o Xylenes	1050.7	1000
p Xylene	995J	1000
Bromoform	ND	500
1,1,2,2-Tetrachloroethane	147J	500

ALL-TEST ENVIRONMENTAL LABORATORIES, INC.
60 Railroad Avenue, Hasbrouck Heights, N.J. 07604
(201) 288-6511 FAX: (201) 288-6887

Volatile Organic Analysis Data

Project No. 61012 Hexel
Sample No. S-2839 AST INF
Client Name: Heritage Remediation

Matrix: Water
Dilution Factor: 100:1
Date Analyzed: 1/29/92

COMPOUND	UG/L	MDL
1,3-Dichlorobenzene	2315.8	1000
1,2-Dichlorobenzene	2142.7	1000
1,4-Dichlorobenzene	10971.2	1000

ND = None Detected
MDL = Method Detection Limit
BMDL = Below Method Detection Limit
** = Compound Found In Laboratory Blank

SURROGATE COMPOUNDS	RECOVERY	LIMITS
1,2-Dichloroethane-d4	102%	70-121
Toluene-d8	114%	81-117
4-Bromofluorobenzene	107%	74-121

By:

Irving Berkowitz
Lab Manager

CERTIFIED BY NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION, LAB. #02525

884170015

ALL-TEST ENVIRONMENTAL LABORATORIES, INC.
60 Railroad Avenue, Hasbrouck Heights, N.J. 07604
(201) 288-6511 FAX: (201) 288-6887

Volatile Organic Analysis Data
Tentatively Identified Compounds

Project No. 61012 Hexel
Sample No. S-2839 AST INF
Client Name: Heritage Remediation

Matrix: Water
Dilution Factor: 100:1
Date Analyzed: 1/29/92

COMPOUND NAME	RT	EST. CONC. ug/l	Quality
1) Ethene, 1,2-dichloro-, (E)-	9.81	7674.20	96
2) Benzene, 1-bromo-3-fluoro-	25.27	10318.36	93
3) Cyclohexane, 1,2,3-trimethyl-,	25.82	4878.79	64
4) Benzene, 1-ethyl-2-methyl-	26.56	8114.31	94
5) Benzene, 1,2,4-trimethyl-	26.86	5444.67	91
6) Decane	27.06	11873.47	95
7) Benzene, 1-ethyl-2-methyl-	27.51	5629.83	93
8) Benzene, 1,2,4-trimethyl-	28.12	14083.64	94
9) Benzene, 1,2-dichloro-	29.36	7786.15	97
10) Benzene, 1,2,4-trimethyl-	29.60	4540.23	94
11) Undecane	31.33	8082.67	93
12) Benzene, 1,3,5-trichloro-	36.04	5583.17	96
13) Benzene, (2-bromoethyl)-	36.71	10651.91	90
14) Naphthalene, 1-methyl-	38.64	5107.56	90
15) Tetradecane	38.97	7105.74	64

ALL-TEST ENVIRONMENTAL LABORATORIES, INC.
60 Railroad Avenue, Hasbrouck Heights, N.J. 07604
(201) 288-6511 FAX: (201) 288-6887

Volatile Organic Analysis Data

Project No. 61012 Hexel **Matrix: Water**
Sample No. S-2839 AST EFF **Dilution Factor: 50:1**
Client Name: Heritage Remediation **Date Analyzed: 1/29/92**

COMPOUND	UG/L	MDL
Chloromethane	ND	500
Vinyl Chloride	ND	500
Bromomethane	ND	500
Chloroethane	ND	500
Trichlorofluromethane	ND	250
1,1-Dichloroethene	ND	250
Methylene Chloride	24J	250
Trans-1,2 Dichloroethene	ND	250
1,1 Dichloroethane	ND	250
Chloroform	ND	250
1,1,1-Trichloroethane	ND	250
Carbon Tetrachloride	ND	250
Benzene	134J	250
1,2-Dichloroethane	ND	250
Trichloroethene	ND	250
1,2-Dichloroprapane	ND	250
Bromodichloromethane	ND	250
Trans-1,3-Dichloropropene	ND	250
Toluene	ND	250
Cis-1,3-Dichloropropene	ND	250
1,1,2-Trichloroethane	ND	250
2-Chloroethyl Vinyl Ether	ND	250
Tetrachloroethene	55J	250
Dibromochloromethane	ND	250
Chlorobenzene	ND	250
Ethylbenzene	ND	250
m&o Xylenes	ND	500
p Xylene	ND	500
Bromoform	ND	250
1,1,2,2-Tetrachloroethane	ND	250

ALL-TEST ENVIRONMENTAL LABORATORIES, INC.
60 Railroad Avenue, Hasbrouck Heights, N.J. 07604
(201) 288-6511 FAX: (201) 288-6887

Volatile Organic Analysis Data

Project No. 61012 Hexel
Sample No. S-2839 AST EFF
Client Name: Heritage Remediation

Matrix: Water
Dilution Factor: 50:1
Date Analyzed: 1/29/92

COMPOUND	UG/L	MDL
1,3-Dichlorobenzene	ND	500
1,2-Dichlorobenzene	ND	500
1,4-Dichlorobenzene	124J	500

ND = None Detected
MDL = Method Detection Limit
BMDL = Below Method Detection Limit
** = Compound Found In Laboratory Blank

SURROGATE COMPOUNDS	RECOVERY	LIMITS
1,2-Dichloroethane-d4	98%	70-121
Toluene-d8	107%	81-117
4-Bromofluorobenzene	106%	74-121

By: Irving Berkowitz
Lab Manager

CERTIFIED BY NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION, LAB. #02525

884170018

ALL-TEST ENVIRONMENTAL LABORATORIES, INC.
60 Railroad Avenue, Hasbrouck Heights, N.J. 07604
(201) 288-6511 FAX: (201) 288-6887

Volatile Organic Analysis Data
Tentatively Identified Compounds

Project No. 61012 Hexel
Sample No. S-2839 AST EFF
Client Name: Heritage Remediation

Matrix: Water
Dilution Factor: 50:1
Date Analyzed: 1/29/92

COMPOUND NAME	RT	EST. CONC. ug/l	Quality
1) UNKNOWN	2.76	1822.05	0
2) Decane	27.02	1694.32	95
3) Decane, 4-methyl-	28.06	1555.83	87
4) Undecane, 2,5-dimethyl-	29.79	1308.15	53
5) Undecane	31.28	2159.66	96
6) Heptadecane, 2,6,10,14-tetrame	34.20	1579.45	72
7) Dodecane	35.17	2058.45	95
8) Pentadecane, 2,6,10,14-tetrame	36.93	1532.94	64
9) Tridecane	37.45	2345.80	95
10) Decane, 5-propyl-	38.29	1167.65	91
11) 7H-BENZOCYCLOHEPTENE	38.67	2078.04	42
12) Tetradecane	38.98	4041.71	93
13) Octadecane	39.74	2875.30	60
14) Pentadecane	40.15	1790.72	83
15) Naphthalene, 1,6-dimethyl-	40.34	1845.95	97

S-203T

HERITAGE

CHAIN OF CUSTODY RECORD

HERITAGE REMEDIATION/ENGINEERING, INC.

Toledo Division • 5656 Opportunity Drive • Toledo, OH 4

PROJ. NO.	PROJECT NAME
61012	HEXCEL

SAMPLERS: (Signature) Donald W Hopkins

	STA. NO.	DATE	TIME	COMP.	GRAB	STATION LOCATION	NO. OF CONTAINERS	VOC + 15	PCBs	BOD	COD	PH	REMARKS
S-1	H-2F	1-27-92	0830		X	H-2 TANK FINAL	2-QTS		X	X	X	X		- RUSH -
	AST-2I	1-25-92	1100		X	AST-2 INFLUENT	2-40ml	X						
	AST-2E	1-25-92	1100		X	AST-2 EFFLUENT	2-40ml	X						STANDARD
S-2	Carbon	1-25-92	1030		X	Carbon #1 EFF / Carbon #2 INFLUENT	2 QT		X					
S-3	AST-2	1-25-92	1030		X	AST-2 / EFFLUENT	2 QT		X					

Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Donald W Hopkins	1/27/92 0900	R. Bilinski			
Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature)	Date / Time	Received for Laboratory by: (Signature)	Date / Time	Remarks	

884170020

ALL-TEST ENVIRONMENTAL LABORATORIES, INC.
60 Railroad Avenue, Hasbrouck Heights, N.J. 07604
(201) 288-6511 FAX: (201) 288-6887

Client Name: Heritage Rem/Eng. Co. Date: February 5, 1992
Laboratory Project #: S-2854
Reference: Final Tank Effluent
Location: Hexel, Lodi, New Jersey

LABORATORY AUTHENTICATION STATEMENT

I certify that ALL-TEST ENVIRONMENTAL LABORATORIES meets the Laboratory Performance Standards and Quality Control requirements specified in N.J.A.C. 7:18, 40 CFR Part 136 for Water and Wastewater analyses and SW 846 for Solid Waste Analyses. I have personally examined and am familiar with the information contained in this report, and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate, complete, and meets the standards specified in N.J.A.C. 7:18, 40 CFR Part 136, and/or SW 846.

By:

Irving Berkowitz
Laboratory Manager

CERTIFIED BY NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION, LAB. #02525

884170021

ALL-TEST ENVIRONMENTAL LABORATORIES, INC.
60 Railroad Avenue, Hasbrouck Heights, N.J. 07604
(201) 288-6511 FAX: (201) 288-6887

Method 608 (PCB's)

Project No. 61012
Lab No. S-2854
Client Name: Heritage Remediation

Matrix: Water
Date Received: 2/5/92
Date Analyzed 2/5/92

Sample Location	Final Tank effluent	MDL ug/l
PCB-1016	ND	0.5
PCB-1221	ND	0.5
PCB 1232	ND	0.5
PCB-1242	ND	0.5
PCB-1248	ND	0.5
PCB-1254	ND	0.5
PCB-1260	ND	0.5

By:
Irving Berkowitz
Laboratory Manager

MDL = Method Detection Limit
ND = Non Detected

CERTIFIED BY NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION, LAB. #02525

884170022

S-2857

HERITAGE

CHAIN OF CUSTODY RECORD

HERITAGE REMEDIATION/ENGINEERING, INC.

Toledo Division • 5656 Opportunity Drive • Toledo, OH

PROJ. NO.	PROJECT NAME
61012	HEXCEL

SAMPLERS: (Signature) Donald K Hyde Jr.

STA. NO.	DATE	TIME	COMP.	GRAB	STATION LOCATION	NO. OF CONTAINERS	PCB's	REMARKS
H2F	2-5-92	1310		X	H-2 Final	2	X	(Rush)

Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Donald K Hyde Jr.	2-5-92 1:30 pm	S. Manderano 2-5-92			
Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature)	Date / Time	Received for Laboratory by: (Signature)	Date / Time	Remarks	

884170023

APPENDIX C

Comments on the Extension of the
Public Comment Period

HEXCEL

February 25, 1992

MAR 2 RECD

Via Federal Express

Mr. Dennis Hart
Administrator, Wastewater Facilities Regulation
New Jersey Department of Environmental Protection
Bureau of Industrial Discharge Permits
CN-029
Trenton, New Jersey 08625

RE: Draft SIU Fermit - NJPDES No. NJ0081507
Former Hexcel Corporation Facility; Lodi, NJ

Dear Mr. Hart:

Please be advised that our February 25, 1992 comments regarding the draft New Jersey Pollutant Discharge Elimination System (NJPDES)/Significant Indirect User (SIU) Permit (NJPDES-SIU Permit No. NJ0081507) were submitted in addition to our earlier comments of January 30, 1992. Copies of both letters are attached. We request that both sets of comments be considered prior to issuance of the final permit.

Sincerely,

A. William Nosil
Corporate Environmental Engineering Manager

Attachments

cc: Jeffrey Thein; NJDEPE
Gary Sanderson; NJDEPE
Frank D'Ascensio; PVSC
Lisa Bromberg; Porzio, Bromberg & Newman
Renée van de Griend; ENVIRON
Joe Ritchey; Heritage Remediation/Engineering, Inc.

AWN;sfv

Executive Offices: 11555 Dublin Boulevard, P.O. Box 2312, Dublin, California 94568-0705 • Phone (415) 828-4200

HEXCEL

February 25, 1992

Via Certified-Receipt Requested

Mr. Dennis Hart
Administrator, Wastewater Facilities Regulation
New Jersey Department of Environmental Protection
Bureau of Industrial Discharge Permits
CN-029
Trenton, New Jersey 08625

RE: **Draft SIU Permit - NJPDES No. NJ0081507**
Former Hexcel Corporation Facility; Lodi, NJ

Dear Mr. Hart:

The following comments are submitted in response to the Public Notice regarding the draft New Jersey Pollutant Discharge Elimination System (NJPDES)/Significant Indirect User (SIU) Permit issued to Hexcel Corporation (NJPDES-SIU Permit No. NJ0085107).

Comment No. 1

Pretreatment of ground water will include oil/water separation in addition to the equalization, air stripping, filtration, and granular activated carbon adsorption. The description of pretreatment under "Description of Facility Operations" on the SIU Fact Sheet should be modified to include oil/water separation.

Comment No. 2

Part III-L specifies that discharge point DSN001 shall be for the discharge of pretreated basement seepage water and ground water only. It is requested that this be modified to include pretreated stormwater collected in the DNAPL containment area and pretreated rinse water from decontamination of pretreatment system and monitoring system equipment, in addition to pretreated basement seepage water and ground water.

Comment No. 3

The "Classification of Industrial Wastewater Treatment System" scoring sheet should be modified to reflect additional wastewater pretreatment processes.

Under Section D, which lists primary pretreatment processes, additional treatment will include pH adjustment (1 point), oil separation (3 points), chemical coagulation/flocculation (5 points), and chemical addition (2 points). Under Section G, which lists sludge handling and disposal processes, additional treatment will include sludge dewatering (4 points). The total number of points will be increased from 51 to 66. The facility class will remain as N3.

Please let me know if you have any questions regarding these comments.

Sincerely,

A. William Nosil
Corporate Environmental Engineering Manager

cc: Jeffrey Thein; NJDEPE
Gary Sanderson; NJDEPE
Frank D'Ascensio; PVSC
Lisa Bromberg; Porzio, Bromberg & Newman
Renée van de Griend; ENVIRON
Joe Ritchey; Heritage Remediation/Engineering, Inc.

AWN;sfv

HEXCEL

January 30, 1992

Mr. Dennis Hart
Administrator, Wastewater Facilities Regulation
New Jersey Department of Environmental Protection
Bureau of Industrial Discharge Permits
CN-029
Trenton, New Jersey 08625

RE: Draft SIU Permit - NJPDES No. NJ0081507
Former Hexcel Corporation Facility; Lodi, NJ

Dear Mr. Hart:

The following comments are submitted in response to the Public Notice regarding the draft New Jersey Pollutant Discharge Elimination System (NJPDES)/Significant Indirect User (SIU) Permit issued to Hexcel Corporation (NJPDES-SIU Permit No. NJ0085107).

Comment No. 1

The property owner is incorrectly listed on the draft permit as Hexcel Corporation. Hexcel Corporation is the owner of the ground water treatment system only. Fine Organics Corporation is the property owner. The permit should be modified to reflect the correct property owner.

Comment No. 2

As indicated in the "SIU Permit Summary Table - Statement of Basis", certain discharge limitations were derived from a synthesis of the most stringent limitations from the National Categorical Pretreatment Standards for Metal Finishing, Electroplating, and Inorganic Chemicals Manufacturing Point Source Categories. The monthly average discharge limitations for copper, lead, and zinc presented in the permit are more stringent than the federal drinking water

Executive Offices: 11555 Dublin Boulevard, P.O. Box 2312, Dublin, California 94568-0705 • Phone (415) 828-4200

standards, or Maximum Contaminant Levels (MCLs), for these metals. The presence of metals in ground water at the facility appear to be solely a result of contact with minerals in the soil. Metals have not been identified as parameters of concern in ground water at the facility, and the ground water treatment system does not include a treatment unit for metals reduction. It is requested that the monthly average discharge limitations for copper, lead, and zinc be changed to the respective MCLs for these metals.

Please let me know if you have any questions regarding these comments.

Sincerely,

A. William Nosil
Corporate Environmental Engineering Manager

cc: Gary Sanderson; NJDEP
Frank D'Ascensio; PVSC
Lisa Bromberg; Porzio, Bromberg & Newman
Rob Powell; ENVIRON
Joe Ritchey; Heritage Remediation/Engineering, Inc.

AWN;sfv

APPENDIX D

NJDEP Response

MAR 9 RECD.

State of New Jersey
Department of Environmental Protection and Energy
Division of Responsible Party Site Remediation
CN 028
Trenton, NJ 08625-0028
Tel. # 609-633-7141
Fax. # 609-777-4285

Scott A. Weiner
Commissioner

Karl J. Delaney
Director

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAR 5 1992

Mr. Edward Hogan, Esq.
Porzio, Bromberg & Newman
163 Madison Avenue
Morristown, NJ 07960

Dear Mr. Hogan:

RE: Hexcel Corp. - Industrial Chemicals Group ("Hexcel")
Lodi Borough, Bergen County
ECRA Case #86009

This letter is to address several out standing issues that have arisen during the Environmental Cleanup Responsibility Act (ECRA) review of the above referenced case. Hexcel shall submit to this office, with the Progress Report due on or before March 15, 1992, a revised time schedule to include all actions necessary to address the comments listed below. Hexcel shall comply with all other timeframes set forth in the requirements below.

I. Ground Water

The NJDEPE has completed the review of the Hexcel's response letter, dated August 9, 1991 and has the following comments:

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The NJDEPE conceptually approves of the seven well system for ground water recovery and hydraulic control at the site. However, the NJDEPE is concerned over the ability of the ground water recovery system to achieve hydraulic control of the contaminant plume. Therefore, Hexcel shall submit, with the Progress Report due April 15, 1992, a proposal to evaluate the effectiveness of the ground water recovery system in achieving hydraulic control of the contaminant plume. If the ground water recovery system cannot maintain a sufficient drawdown to achieve hydraulic control, Hexcel shall submit a proposal to modify the ground water recovery system, which may include the connection of additional control wells.

2. Off-Site Receptors

Hexcel shall provide the status of the required Off-Site Receptor investigation, including the anticipated submittal of a completed report. Based upon the review of the report, the NJDEPE will determine the necessity of a bedrock investigation.

3. Off-Site Monitor Wells

The NJDEPE has determined that the installation of wells between existing well MW-20 and required well MW-37 is necessary to fully delineate ground water contamination east of the site. This conclusion is based on the presence of elevated levels of dissolved volatile organic compounds (VOCs) in existing wells in this area.

Although the required wells focused on the delineation of contamination in the upper aquifer, the characterization of overburden in this area is necessary. The current data supporting the presence of a upper and lower aquifer may not be accurate due to the fact that the clay layer appears to terminate at the eastern portion of the site. Hexcel shall submit, with the Progress Report due April 15, 1992, a proposal for delineation of contamination for the eastern portion of the site. The proposal shall address the evaluation of the chemical and geologic data that exists for the eastern portion of the site.

4. Monitor Well MW-7

The proposal to evaluate the integrity of monitor wells MW-7 and MW-9 by collecting samples to determine the presence of dense non-aqueous phase liquid (DNAPL) or high concentrations of dissolved VOCs is acceptable. Should Hexcel determine that the integrity of the wells are threatened, the monitor wells shall be properly abandoned. Hexcel shall determine whether stainless steel replacement wells are necessary.

5. Light Non Aqueous Phase Liquid (LNAPL)

A review of the LNAPL recovery data indicates that significant amounts of LNAPL remain in the ground water beneath the site. The greatest quantity of LNAPL appears to be located near monitor well CW-7, rather than near the boiler room.

Hexcel shall submit, with the Progress Report due April 15, 1992, a proposal for the installation of a LNAPL recovery system on CW-7.

As product under the boiler room has been limited to less than 0.5 feet, installation of additional monitoring/recovery wells in the immediate area of the boiler room is not necessary at this time. However, Hexcel shall address whether any actions can be taken to enhance recovery from the existing wells and piezometers under the boiler room.

In addition, Hexcel shall implement a monthly LNAPL monitoring program at the site. Hexcel shall submit, with the Progress Report due April 15, 1992, a proposal designating the monitor wells to be include as a part of the monitoring program. The measurements shall include depth to product, depth to water, product thickness and water elevation with respect to top of well screen (to demonstrate whether the well is screened through the water table). Results of the monitoring program shall be submitted with each monthly progress report.

6. Additional DNAPL Delineation Wells

The NJDEPE has reconsidered the requirement for the installation of an additional well south/southeast of RW7-8 and has determined that the installation of this well is not necessary at this time.

However, Hexcel shall implement a monthly DNAPL monitoring program at the site. Hexcel shall submit, with the Progress Report due April 15, 1992, a proposal designating the monitor wells to be included as a part of the monitoring program. The measurements shall include depth to product, depth to water and product thickness. Results of the monitoring program shall be submitted with each monthly progress report.

7. Ground Water Contour Maps

The proposal to collect ground water elevations and submit ground water contour maps on a quarterly basis rather than on a monthly basis is acceptable. Ground water elevations shall be collected from all available wells. If a well is inaccessible, Hexcel shall document the reason for inaccessibility. Collection of ground water elevation measurements and submittal of ground water contour maps will be required on a more frequent basis after the ground water recovery system is in operation.

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The isopleth maps for the shallow aquifer are acceptable. However, Hexcel shall submit, with the Progress Report due on April 15, 1992, an isopleth map for the deep aquifer showing total aqueous-phase VOCs, and separate isopleth maps of the most ubiquitous VOCs detected. All isopleth maps should be referenced by date of sample collection and analytical method.

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The geologic cross-sections submitted by Hexcel with the Progress Reports dated August 15, 1991 and September 15, 1991 are acceptable.

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The proposal to characterize the lower overburden aquifers and bedrock aquifers is acceptable.

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Hexcel shall complete the packer test as required by NJDEPE's letter dated July 12, 1991. Hexcel shall provide, with the Progress Report due April 15, 1992, the status of locating the necessary packers to conduct the test.

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The NJDEPE understands that the current focus is on the substitution of Fine Organics cooling water with treated ground water. Hexcel shall provide, with the Progress Report due April 15, 1992, the status of negotiations with Fine Organics and Passaic Valley Sewerage Authority (PVSC) regarding the substitution plan. The Department expects to set a deadline for finalization of the substitution plan, beyond which, Hexcel

will be required to pursue other disposal options.

13. Monitor Well Specification Table

The revised monitor well specification table is acceptable.

14. Off-Site Monitor Wells

The NJDEPE has reconsidered the requirement for the installation of an additional well at the intersection of Main and Molnar Streets. Since monitor well MW-22 has been installed 20 feet west of this location, and the installation of a well closer to the intersection is not possible due to overhead power lines, the NJDEPE has determined that the installation of this well is not necessary.

III. Technical Meeting

Due to the complexity of the outstanding ground water issues, the NJDEPE requests that a meeting be arranged to discuss the topics contained in this letter, as well as, the issues listed below. The Case Manager will be contacting Hexcel to schedule a meeting at a mutually agreeable date and time.

1. The extent of the DNAPL plume in the area of MW-8 and the possible discharge of DNAPL into Saddle River.

2. RW7-4 contains significant amounts of DNAPL. Hexcel shall consider recovery of DNAPL from this well.

3. The DNAPL investigation has focused on the area between Building 2 and Saddle River. High VOC concentrations detected in MW-17 and CW-5 may indicate the presence of product. The possibility of the presence of DNAPL on this side of the site should be discussed. It is noted that MW-17 and CW-5 are separated from the area between Building 2 and Saddle Brook by a topographic high in the clay.

4. A trace amount of DNAPL and elevated concentrations of dissolved VOs have been detected in MW-27, on the east side of Building 2. The relationship of this DNAPL to that known to exist between Building 2 and Saddle Brook should be discussed.

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6. The status of delineation of contamination in the lower aquifer.

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The NJDEPE has completed the review of the Progress Report dated January 14, 1992 and has the following comments.

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Hexcel's response is conditionally acceptable. The NJDEPE has reconsidered the requirement for the additional delineation of contaminated soils in this area and has determined that additional delineation is not necessary. However, this area shall be incorporated into the site-wide soil remediation proposal. In addition, Hexcel shall provide the status of the soil remediation proposal, including the anticipated submittal of a completed proposal.

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The description of the collection of the post-excavation samples, provided by Hexcel, is acceptable.

3. UST Vent Lines/Pipes

Hexcel's response is acceptable.

4. Gasoline UST Northeast of Building 6

The information Hexcel has provided regarding the excavation and collection of samples does not support a conclusion as to whether the sewer lines could have acted as a preferential pathway for contaminant migration. Hexcel shall submit, with the Progress Report due April 15, 1992, a proposal to determine the extent of contamination in this area, including the migration of contaminates along the storm sewer pipes. In addition, this area shall be incorporated into the site-wide soil remediation proposal.

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In accordance with Section V.B.1. of the Remedial Investigation Guide, Hexcel may continue to submit quantitative results for delineation of contamination, however, a non-conformance summary prepared by the laboratory shall be submitted with the quantitative results. Please be advised that the NJDEPE will not approve any no further action proposals or accept any conclusions of having achieved "clean zones" that are not supported by Reduced Regulatory Format (formerly ECRA Tier II) laboratory deliverables.

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Should you have any further questions regarding this matter, please contact Gary Sanderson, the ECRA Cleanup Oversight Case Manager, at (609) 633-7141.

Sincerely,

Tessie W. Fields, Acting Section Chief
Bureau of Environmental Evaluation
and Cleanup Responsibility Assessment

c: Michael McCann, BEERA
Beverly Phillips, BGWDC
William Mosil, Hexcel
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